

**THE REICH LAW FIRM**

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*Counsel for Defendants  
GH Express Cali Inc. and Manjinder Kaur*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

PROCAPS LABORATORIES, INC, a Nevada  
corporation

Plaintiff,

v.

GH EXPRESS CALI, INC, a Foreign  
Corporation; MANJINDER KAUR d/b/a GH  
EXPRESS; DOES 1-10, inclusive; and ROES  
1-10 inclusive

Defendants.

GH EXPRESS CALI INC,  
Counterclaimant,

v.

PROCAPS LABORATORIES INC,  
Counter Defendant.

Case No. 2:21-CV-02016-CDS-BNW

**MOTION OF DEFENDANTS GH  
EXPRESS CALI, INC., AND  
MANJINDER KAUR d/b/a GH  
EXPRESS TO EXTEND THE TIME  
WITHIN WHICH DEFENDANTS  
MUST ENGAGE LOCAL COUNSEL**

COME NOW Defendants, GH EXPRESS CALI, INC. ("GH EXPRESS") and  
MANJINDER KAUR d/b/a GH EXPRESS ("Kaur") (collectively the "Defendants"), by and  
through their counsel of record, Jeff Reich of the Reich Law Firm, and hereby file this their Motion  
To Extend the Time within which Defendants Must Engage Local Counsel.

Pursuant to Local Rule LR IA 11-2(d) and this Court's order of December 1, 2022 (ECF  
No. 59), Defendants are required to engage new local counsel following the withdrawal of Ms.  
Smith as local counsel for Defendants by December 16, 2022.

In an effort to meet these requirements, the undersigned has corresponded and spoken with  
local counsel who are currently evaluating the case, but are not able to complete that evaluation  
by today. Accordingly, because we are in the midst of the Christmas season, Defendants seek an

1 extension of two weeks, until December 30, 2022, to designate new local counsel.

2 Dated this 16<sup>th</sup> day of December, 2022.

3  
4 **THE REICH LAW FIRM**

5 /s/ Jeff Reich  
6 Jeff Reich, CA Bar No. 067250  
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10 *Counsel for Defendants/Counterclaimants*  
11 *GH Express Cali Inc. and Manjinder Kaur*

12 **ORDER**  
13 **IT IS SO ORDERED**

14 **DATED:** 3:08 pm, December 19, 2022

15 

16 **BRENDA WEKSLER**  
17 **UNITED STATES MAGISTRATE JUDGE**

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that the undersigned served by mail, with first-class postage prepaid, and served electronically

**MOTION OF DEFENDANTS GH EXPRESS CALL, INC., AND MANJINDER KAUR d/b/a GH EXPRESS TO EXTEND THE TIME WITHIN WHICH DEFENDANTS MUST ENGAGE LOCAL COUNSEL**

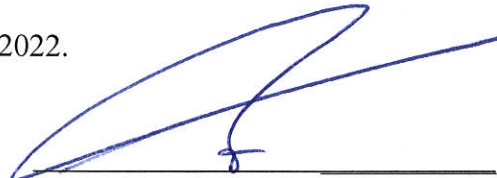
To the following, addressed as follows:

Michael V. Infuso  
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3030 South Jones Blvd, Suite 101  
Las Vegas, Nevada 89146  
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I further certify that I am not a party to this lawsuit, I am over 18 years of age, and am employed as follows:

The Reich Law Firm  
8441 N. Millbrook, Suite 104  
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Email: [jreich@reichlaw.com](mailto:jreich@reichlaw.com)  
[rlaw@reichlaw.com](mailto:rlaw@reichlaw.com)

Dated this 30th day of November, 2022.

  
\_\_\_\_\_  
Sona Vartanian

CERTIFICATE OF SERVICE